

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Miami Division**

PRESIDENT DONALD J. TRUMP,

Plaintiff,

v.

MICHAEL D. COHEN,

Defendant.

Case No.: 23-cv-21377-DPG

**PLAINTIFF'S UNOPPOSED MOTION FOR ENLARGEMENT OF
TIME TO RESPOND TO DEFENDANT'S MOTION TO DISMISS COMPLAINT**

Plaintiff, Donald J. Trump, by and through undersigned counsel, hereby submits his unopposed motion for enlargement of time to respond to Defendant's motion to dismiss Complaint [D.E. 11], and in support thereof states as follows:

1. On April 12, 2023, Plaintiff commenced the instant action.
2. On May 7, 2023, Defendant filed his Unopposed Motion for Leave to File Excess Pages [D.E. 9], which this Court granted by Order entered on May 8, 2023 [D.E. 10].
3. On May 8, 2023, Defendant filed his motion to dismiss the Complaint. The response to the motion to dismiss is due to be filed on May 22, 2023.
4. Given the number of legal issues raised in the thirty-five-page motion to dismiss, Plaintiff seeks additional time in which to file his response to the motion to dismiss.
5. Additionally, Plaintiff's counsel will be engaged in an arbitration hearing this week and next week, which also serves as the basis for the requested extension of time to respond to the motion to dismiss.

6. Through this motion, Plaintiff seeks an enlargement of time of fourteen (14) days, up through and including June 5, 2023, in which to file his response to the motion to dismiss.

CERTIFICATE OF GOOD FAITH CONFERENCE PURSUANT TO LOCAL RULE 7.1

Pursuant to S.D. Fla. L. R. 7.1(a)(3), the undersigned counsel certifies that he spoke by telephone with Defendant's counsel, Benjamin Brodsky, Esq., on May 17, 2023 regarding the relief requested in this Motion for Enlargement of Time, and Defendant's counsel confirmed that Defendant does not oppose the requested extension.

WHEREFORE, Plaintiff Donald J. Trump, respectfully requests that this Court enter an Order (a) granting an enlargement of time, for up to and including June 5, 2023 to file his Response to Defendant Michael D. Cohen's Motion to Dismiss and Incorporated Memorandum of Law, and (b) granting such other and further relief as this Court deems just and proper.

Dated: May 17, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 17, 2023 the foregoing was served via the Court's CM/ECF System upon:

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By: /s/ Alejandro Brito